

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

GOLDEN BETHUNE-HILL, *et al.*,

Plaintiffs,

v.

VIRGINIA STATE BOARD OF ELECTIONS,
et al.,

Defendants,

v.

VIRGINIA HOUSE OF DELEGATES, *et al.*,
Intervenor-Defendants.

Civil Action No. 3:14-cv-00852-REP-
AWA-BMK

CONSENT MOTION TO SUBSTITUTE PLAINTIFFS

Pursuant to the Court's direction during the telephonic conference held on August 11, 2017, Plaintiffs, Defendants, and Intervenor-Defendants (collectively, the "Parties") request that the Court substitute new plaintiffs in District 63 and District 80.

Plaintiffs filed the original Complaint in this matter on December 22, 2014. On June 12, 2015, the parties jointly filed a Motion to Allow Filing of Amended Complaint to add a new plaintiff because a former plaintiff had changed his place of residence. Dkt. No. 66. The Amended Complaint did not differ from the original complaint other than the change of plaintiffs. On June 15, 2015, the Court granted the Parties' motion. Dkt. No. 67.

The Amended Complaint identified Davinda Davis as a Plaintiff residing in District 80. Plaintiffs have determined the need to replace Ms. Davis with Plaintiff Wayne Dawkins because Ms. Davis has changed her place of residence and moved out of the district as of July 29, 2017.

Plaintiff Wayne Dawkins, a resident of District 80, is a United States citizen and registered voter in the Commonwealth of Virginia.

The Amended Complaint also identified Dr. Vivian Williamson as a Plaintiff residing in District 63. Plaintiffs have determined the need to replace Dr. Williamson with Plaintiffs Nancy Ross and Atiba Muse because Dr. Williamson has passed away. Plaintiff Nancy Ross, a resident of District 63, is a United States citizen and registered voter in the Commonwealth of Virginia. Ms. Ross is also the executrix of Dr. Williamson's estate. Plaintiff Atiba Muse, also a resident of District 63, is a United States citizen and registered voter in the Commonwealth of Virginia.

For the foregoing reasons, the Parties respectfully request that this Court permit the substitution of Wayne Dawkins, Nancy Ross, and Atiba Muse for Davinda Davis and Vivian Williamson, that the Amended Complaint filed by Plaintiffs (Dkt. No. 71) remains the operative complaint in this matter, and that the answers previously filed by Defendants (Dkt. No. 31) and Intervenor-Defendants (Dkt. No. 27) remain the operative answers in this matter.

Pursuant to this Court's ECF Policies and Procedures, a consent order reflecting this proposed substitution will be filed with the clerk's office.

Respectfully submitted,

By: /s/ Matthew McGuire (by ACB with permission)

Matthew R. McGuire (VSB No. 84194)
Trevor S. Cox (VSB No. 78396)
Office of the Attorney General
202 North 9th Street
Richmond, VA 23219
Phone: 804.786.7773
Fax: 804.371.0200
Email: mmcguire@oag.state.va.us
Email: tcov@oag.state.va.us

Attorneys for Defendants

By: /s/ Katherine L. McKnight (by ACB with permission)

Katherine L. McKnight (VSB No. 81482)
E. Mark Braden (*pro hac vice*)
Richard B. Raile (VSB No. 84340)
Baker & Hostetler LLP
1050 Connecticut Avenue NW, Ste. 1100
Washington, DC 20036
Phone: 202.861.1500
Fax: 202.861.1783
Email: kmcknight@bakerlaw.com
Email: mbraden@bakerlaw.com
Email: rraile@bakerlaw.com

Dale Oldham, Esq. (*pro hac vice*)
1119 Susan Street
Columbia, SC 29210
Phone: 803.772.7729
Email: dloesq@aol.com

Attorneys for Defendant-Intervenors

By: /s/ Aria C. Branch

Aria C. Branch (VSB No. 83682)
Marc E. Elias
Bruce V. Spiva (*pro hac vice*)
PERKINS COIE LLP
700 Thirteenth Street, N.W., Suite 600
Washington, D.C. 20005-3960
Telephone: 202.654.6338
Facsimile: 202.654.9106
Email: ABranch@perkinscoie.com
Email: MElias@perkinscoie.com
Email: BSpiva@perkinscoie.com

Kevin J. Hamilton
Abha Khanna (*pro hac vice*)
Ryan Spear (*pro hac vice*)
William B. Stafford (*pro hac vice*)
PERKINS COIE LLP
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
Telephone: 206.359.8000
Facsimile: 206.359.9000
Email: KHamilton@perkinscoie.com
Email: AKhanna@perkinscoie.com
Email: BStafford@perkinscoie.com
Email: RSpear@perkinscoie.com

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

On August 15, 2017, I caused to be served upon counsel of record, at the address stated below, via the method of service indicated, a true and correct copy of the above discovery requests.

VIA ELECTRONIC MAIL

Katherine L. McKnight (VSB No. 81482)
E. Mark Braden (*pro hac vice*)
Richard B. Raile (VSB No. 84340)
Baker & Hostetler LLP
1050 Connecticut Avenue NW, Ste. 1100
Washington, DC 20036
Phone: 202.861.1500
Fax: 202.861.1783
Email: kmcknight@bakerlaw.com
Email: mbraden@bakerlaw.com
Email: rraile@bakerlaw.com

Of counsel:
Dale Oldham, Esq. (*pro hac vice*)
1119 Susan Street
Columbia, SC 29210
Phone: 803.772.7729
Email: dloesq@aol.com

Attorneys for Defendant-Intervenors

Matthew R. McGuire (VSB No. 84194)
Trevor S. Cox (VSB No. 78396)
Office of the Attorney General
202 North 9th Street
Richmond, VA 23219
Phone: 804.786.7773
Fax: 804.371.0200
Email: mmcguire@oag.state.va.us
Email: tcox@oag.state.va.us

Attorneys for Defendants